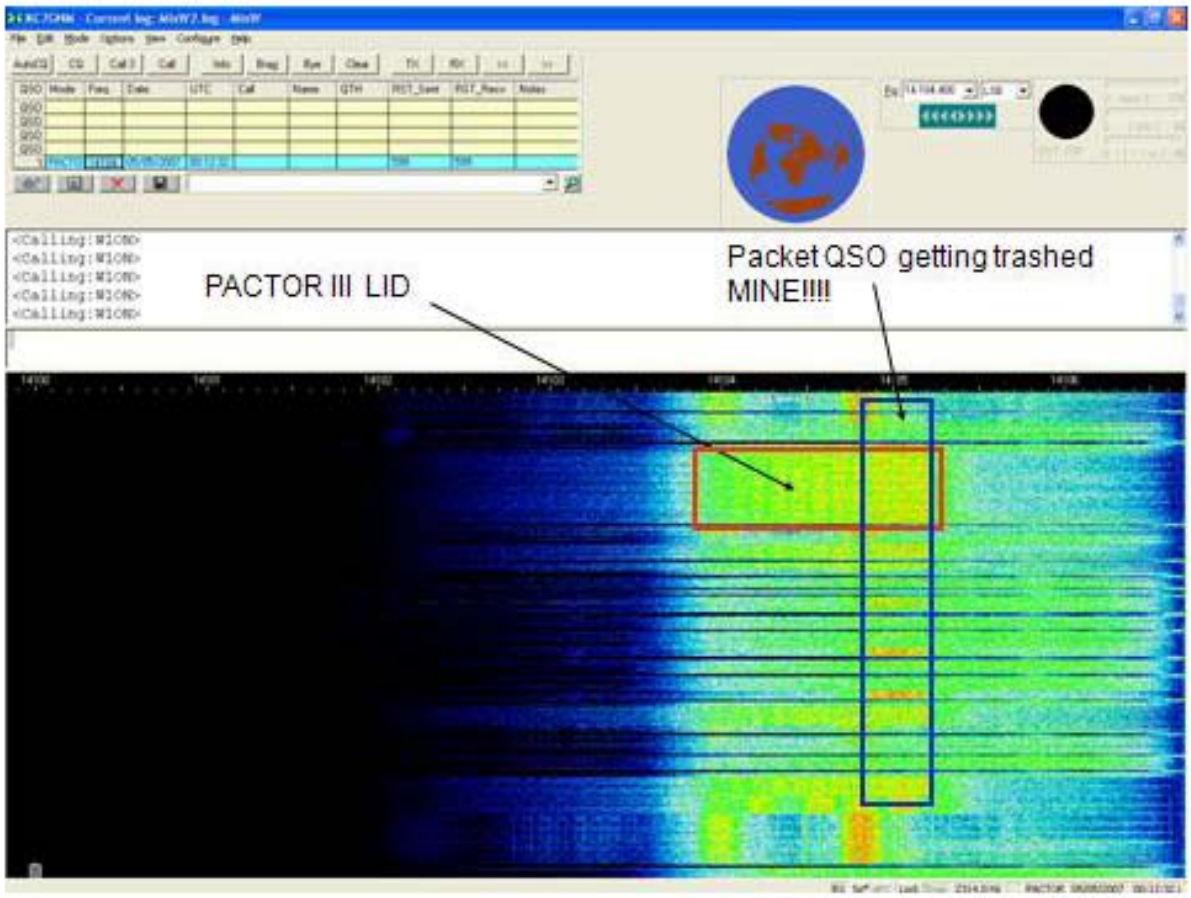
Reply to Comments from Gregory L. Thompson, KC7GNM

To the FCC Commissioner,

I am submitting this as a reply to comments left on the Electronic Comments Filing System for RM-11392.

Since many on here are saying the interference of Pactor III is minimal and there is no evidence to support it, I submit this comment with screenshots of the interference. I will explain each one.



As you can see if Pactor III was limited to a smaller bandwidth the interference would not be an issue as much as it is now. The problem is it starts out at 500hz and expands to 2.4khz after the initial handshake.

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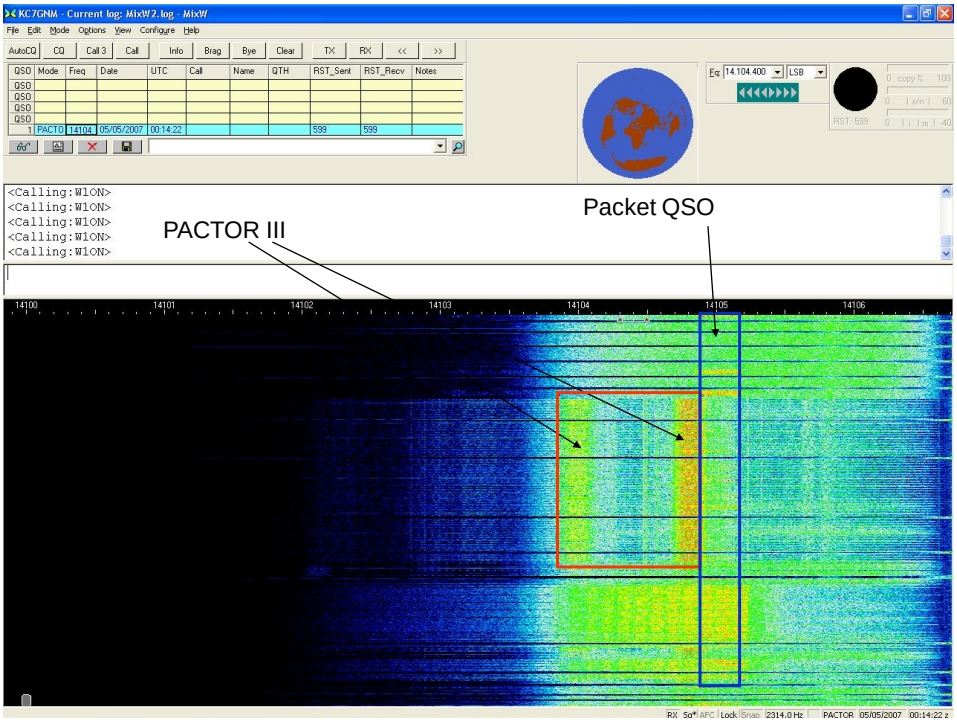
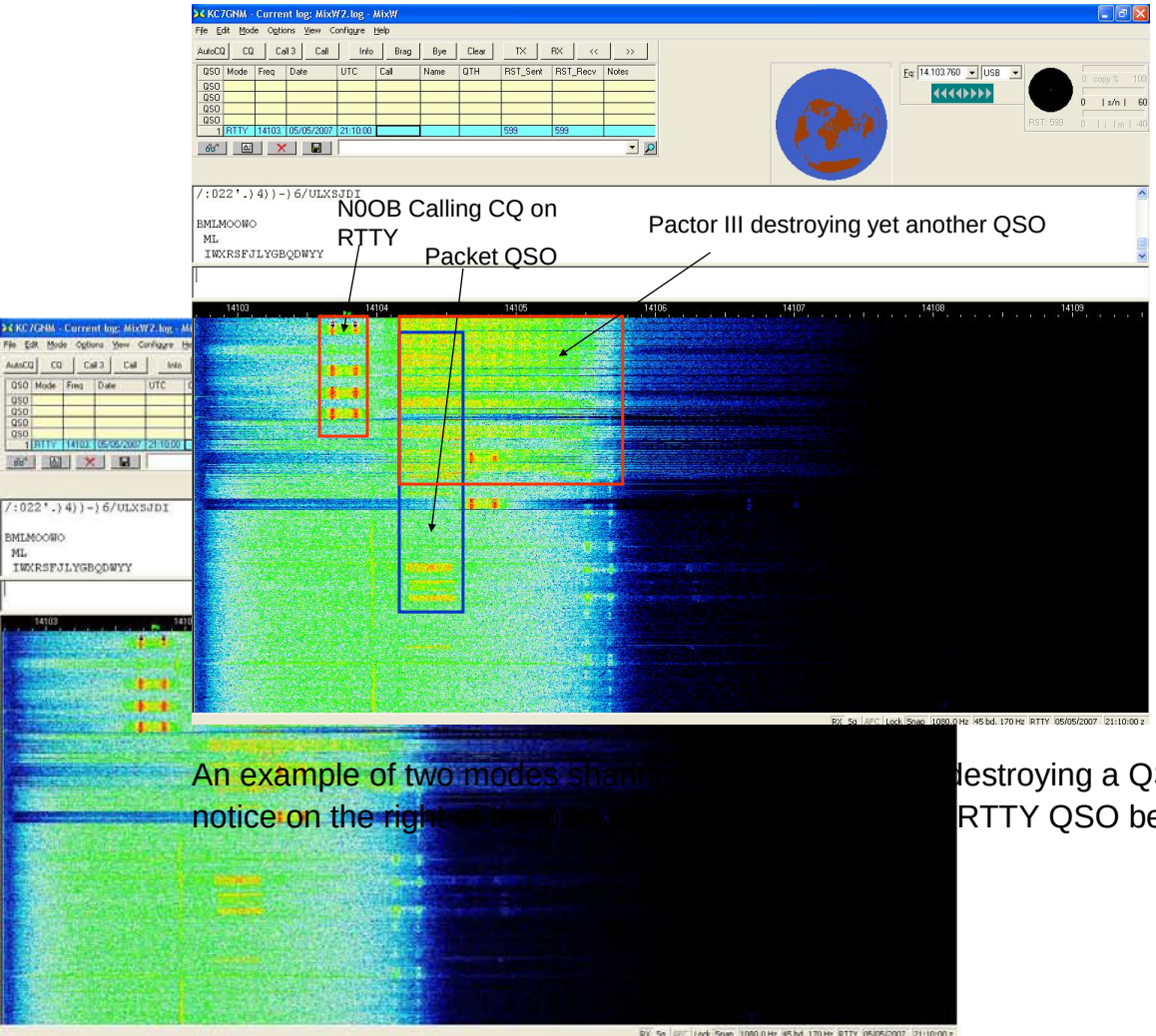


Just another example of the interference some commenter's are saying does not exist.



An example of two modes sharing [illegible] destroying a QSO. Also if you notice on the right [illegible] RTTY QSO being destroyed too.

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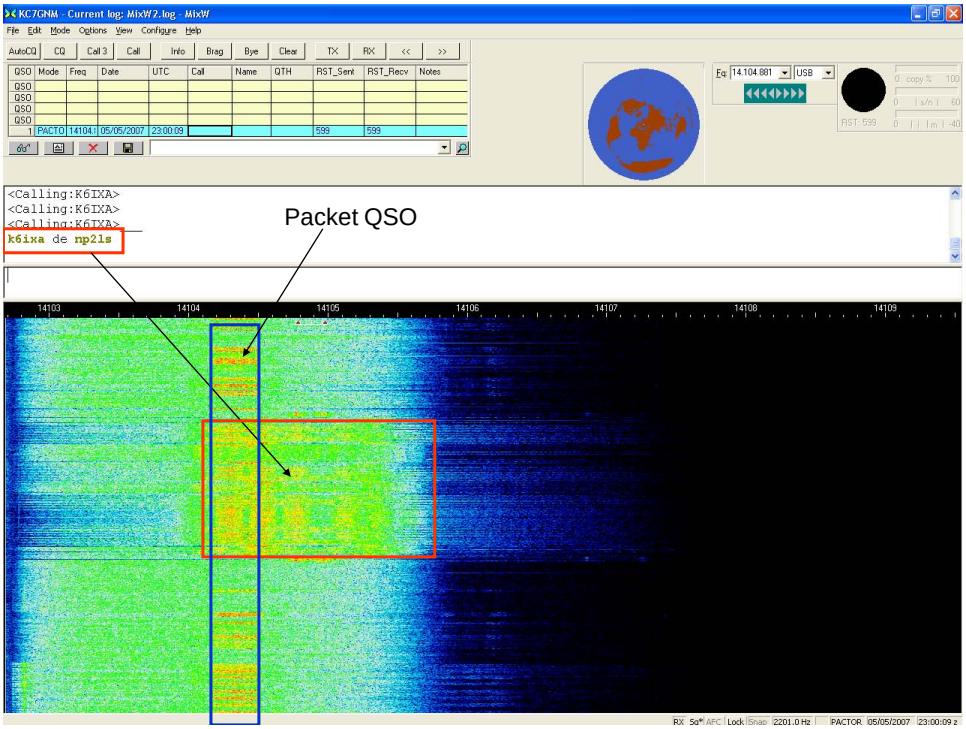
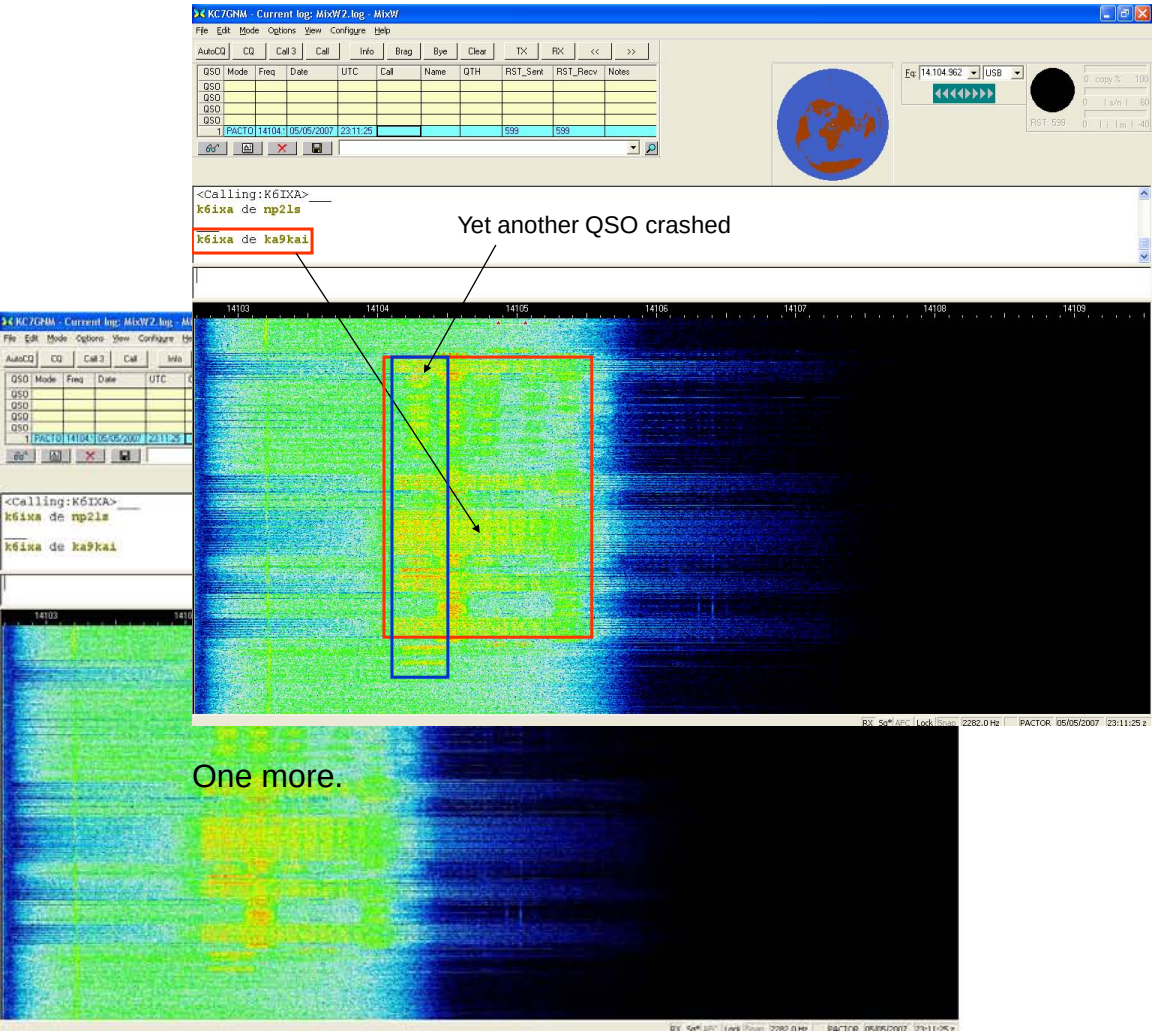


Just another example of the interference issue.



One more.

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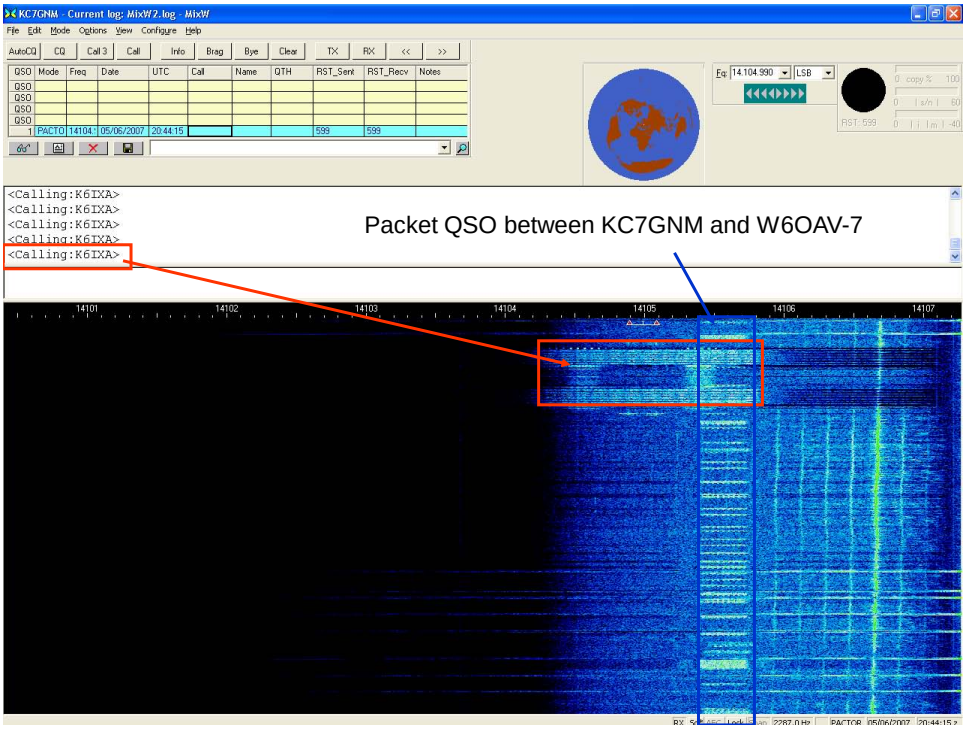
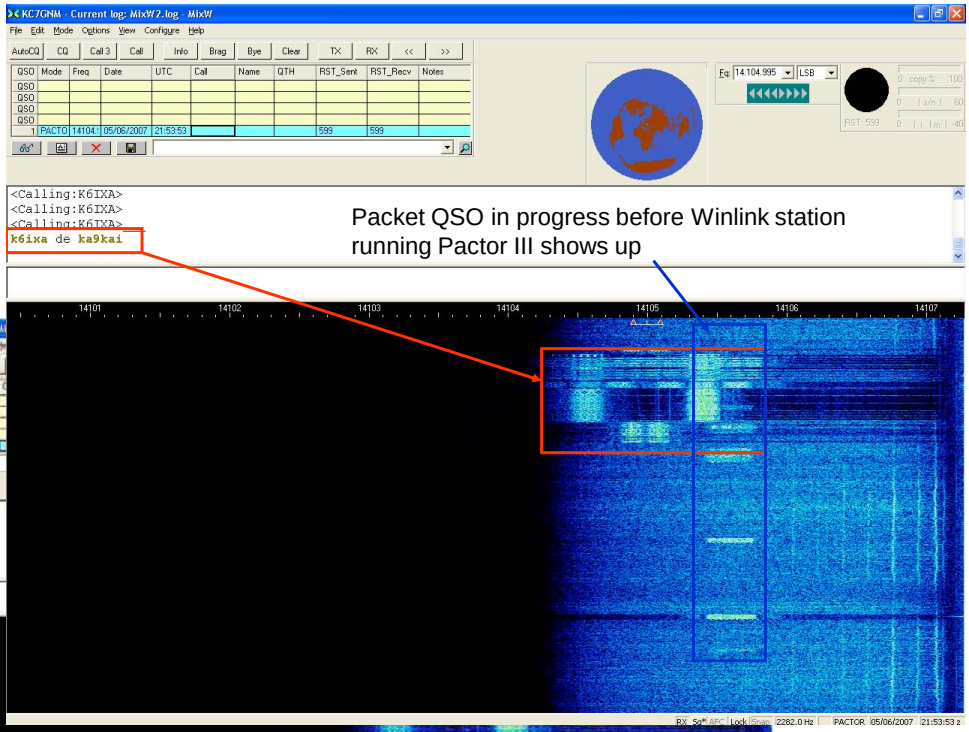


Another one of my QSO's getting destroyed by a ham that is intentionally interfering.



same PMBO. That is because the winlink network administrator ction on their system to improve their throughput.

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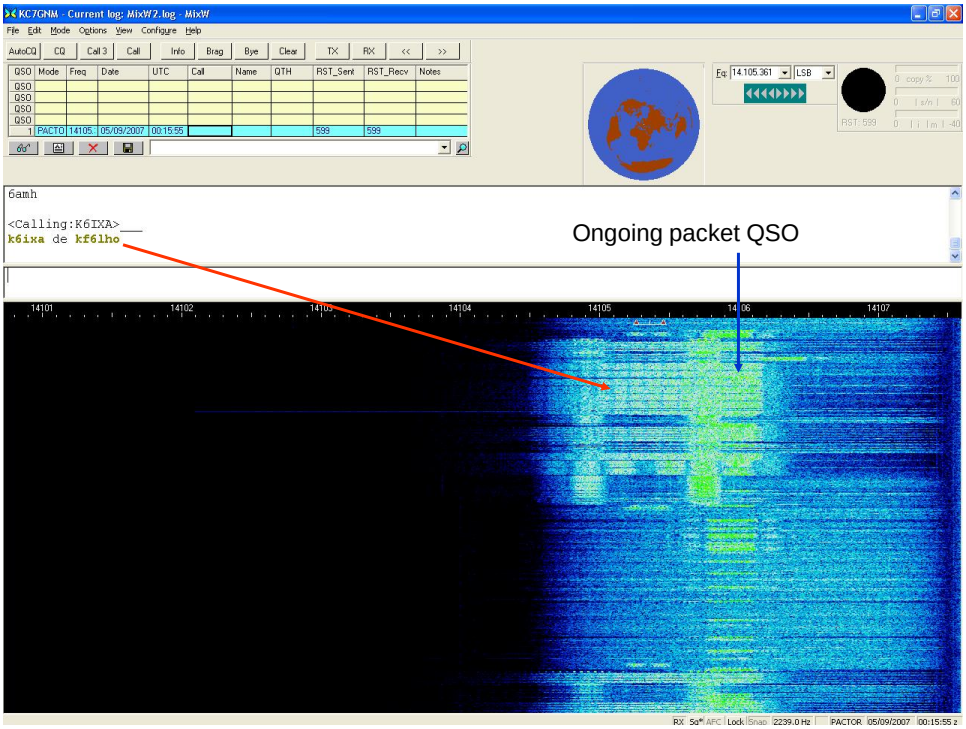
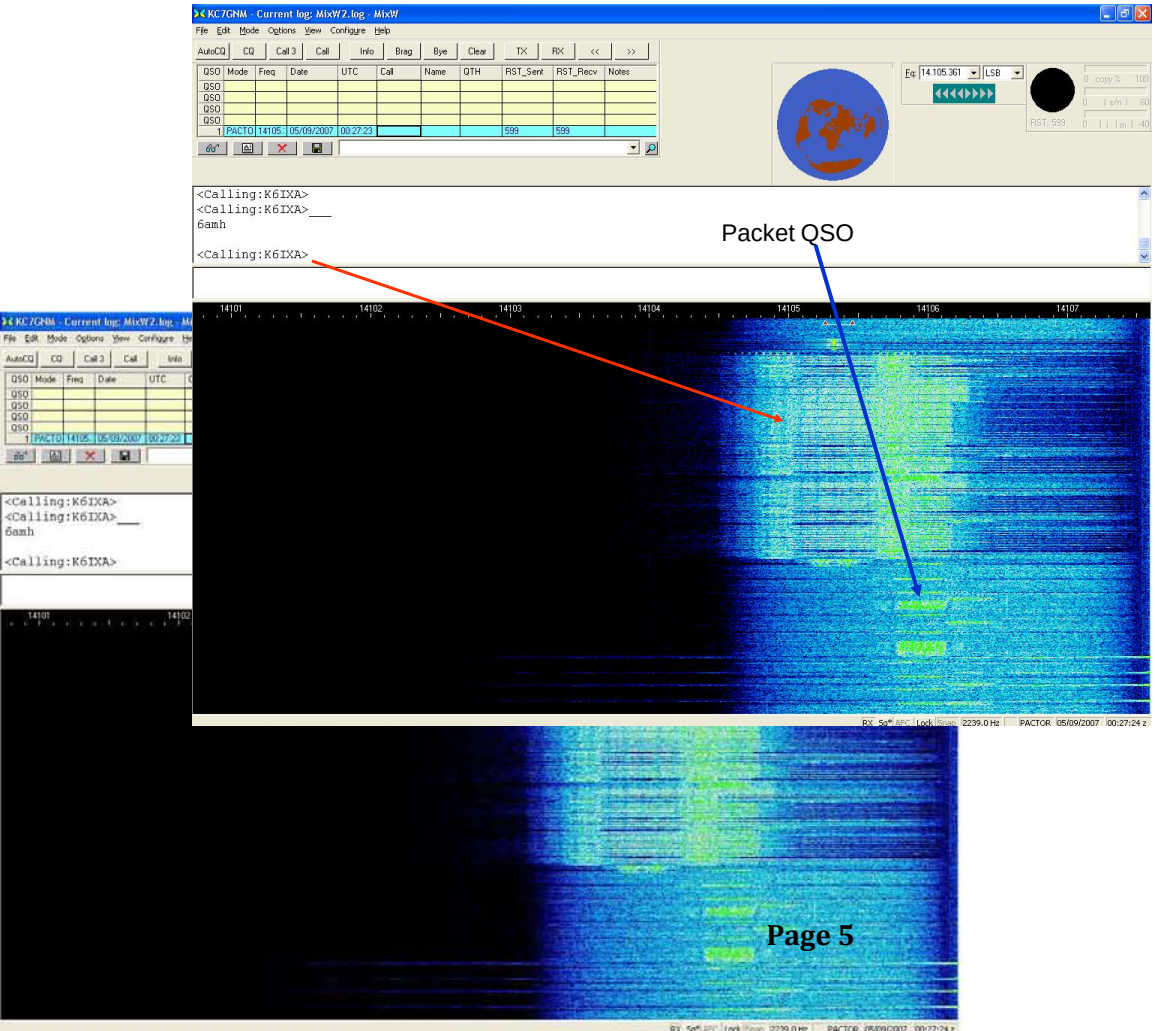
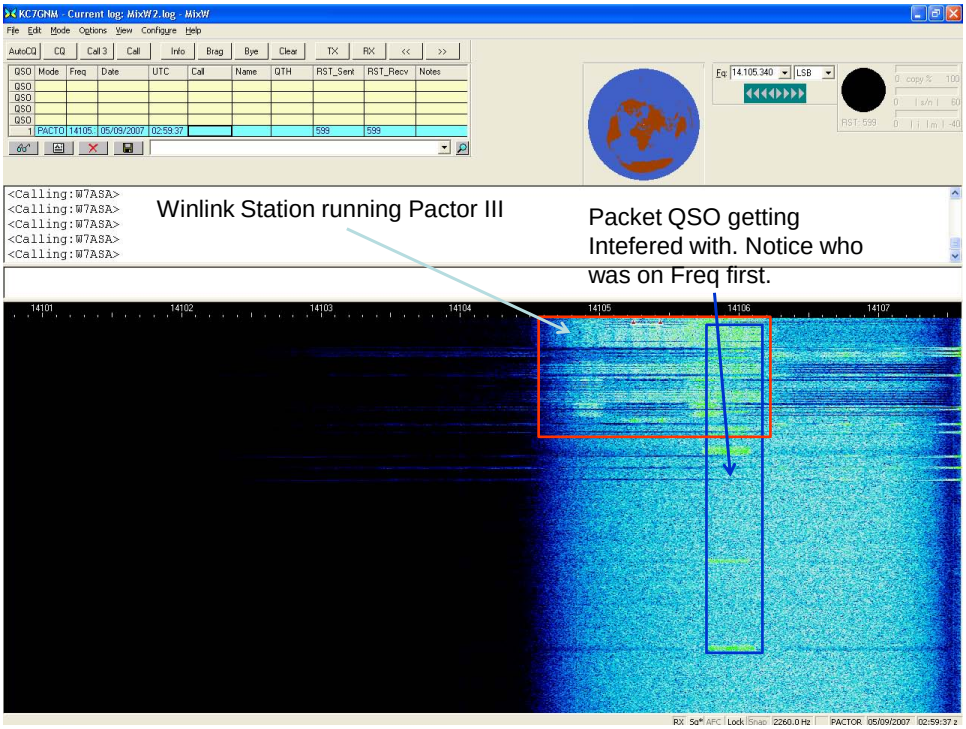
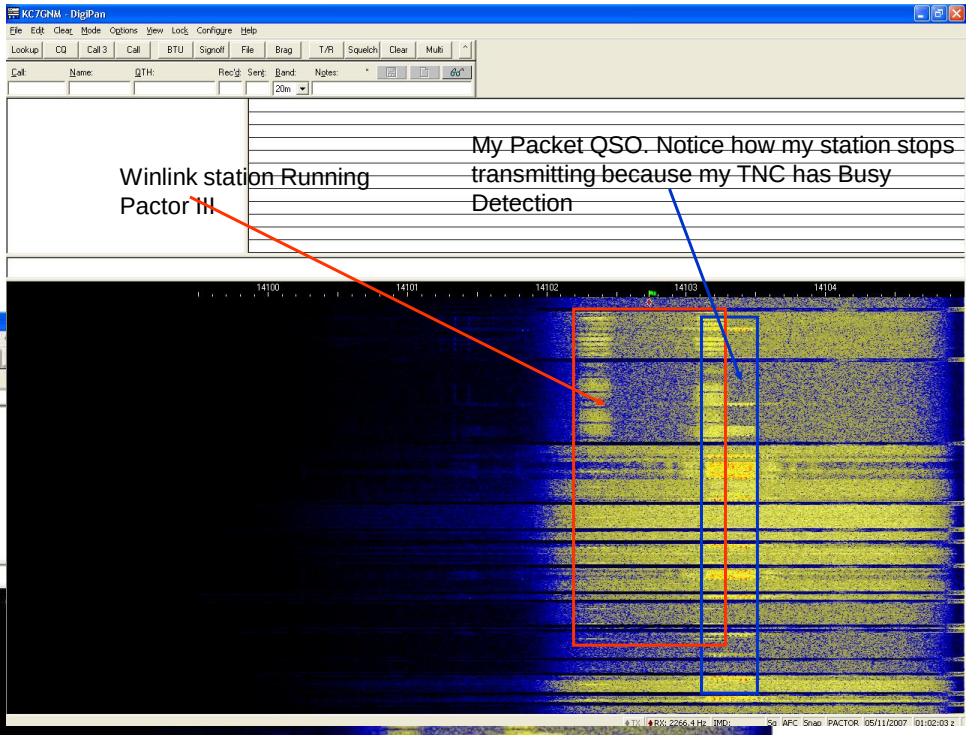


Again.





Yet again.



Once these PMBO robots do not listen first before transmitting like all amateur radio operators are supposed to do.

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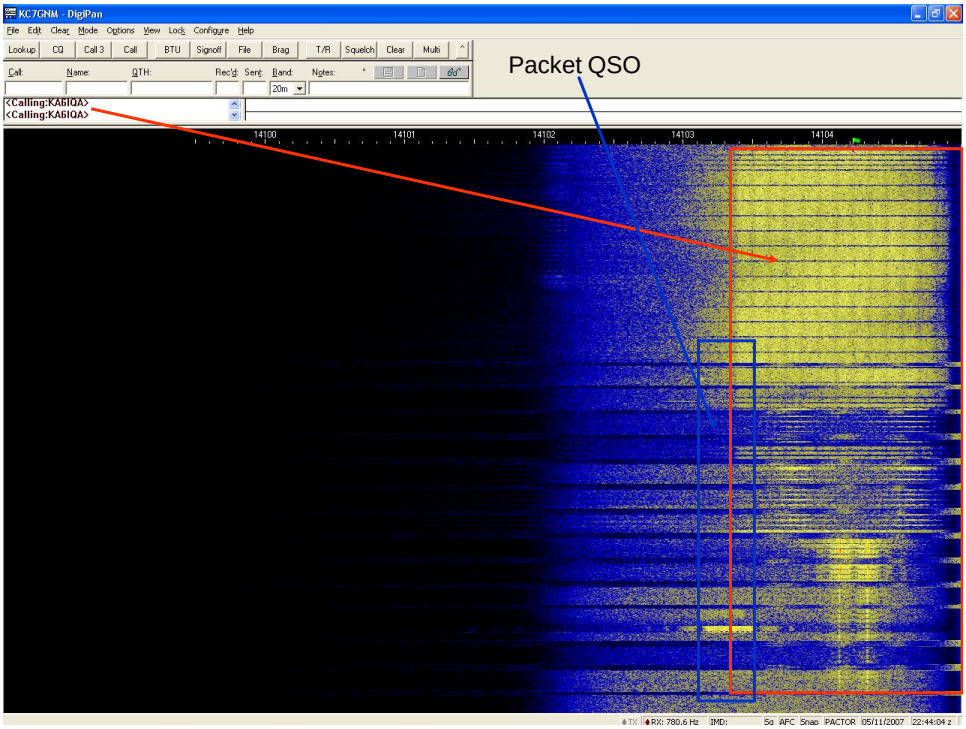
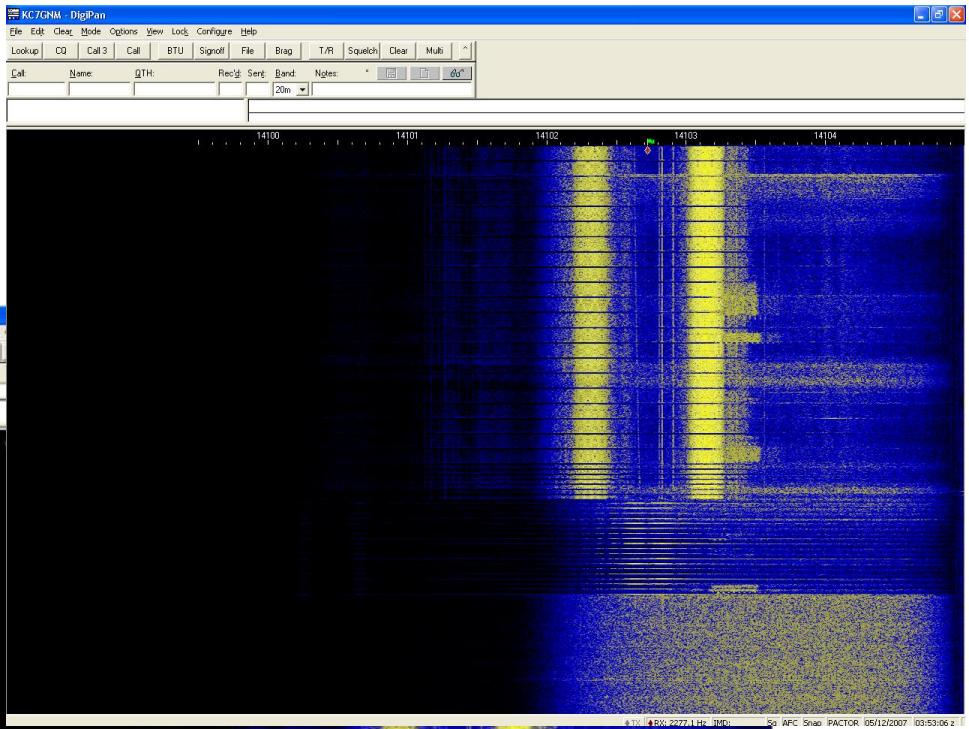
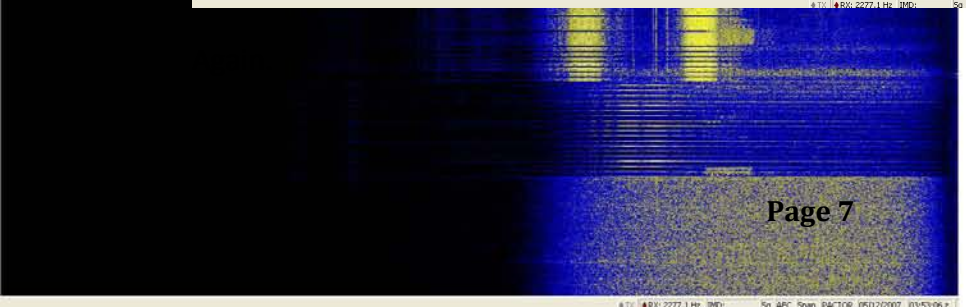
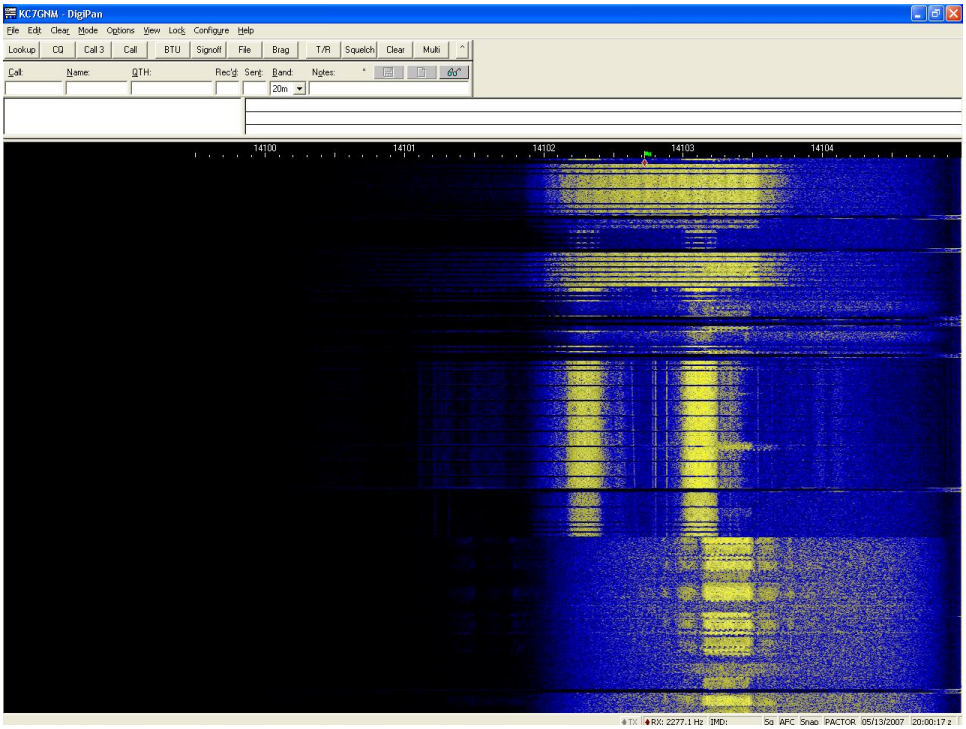


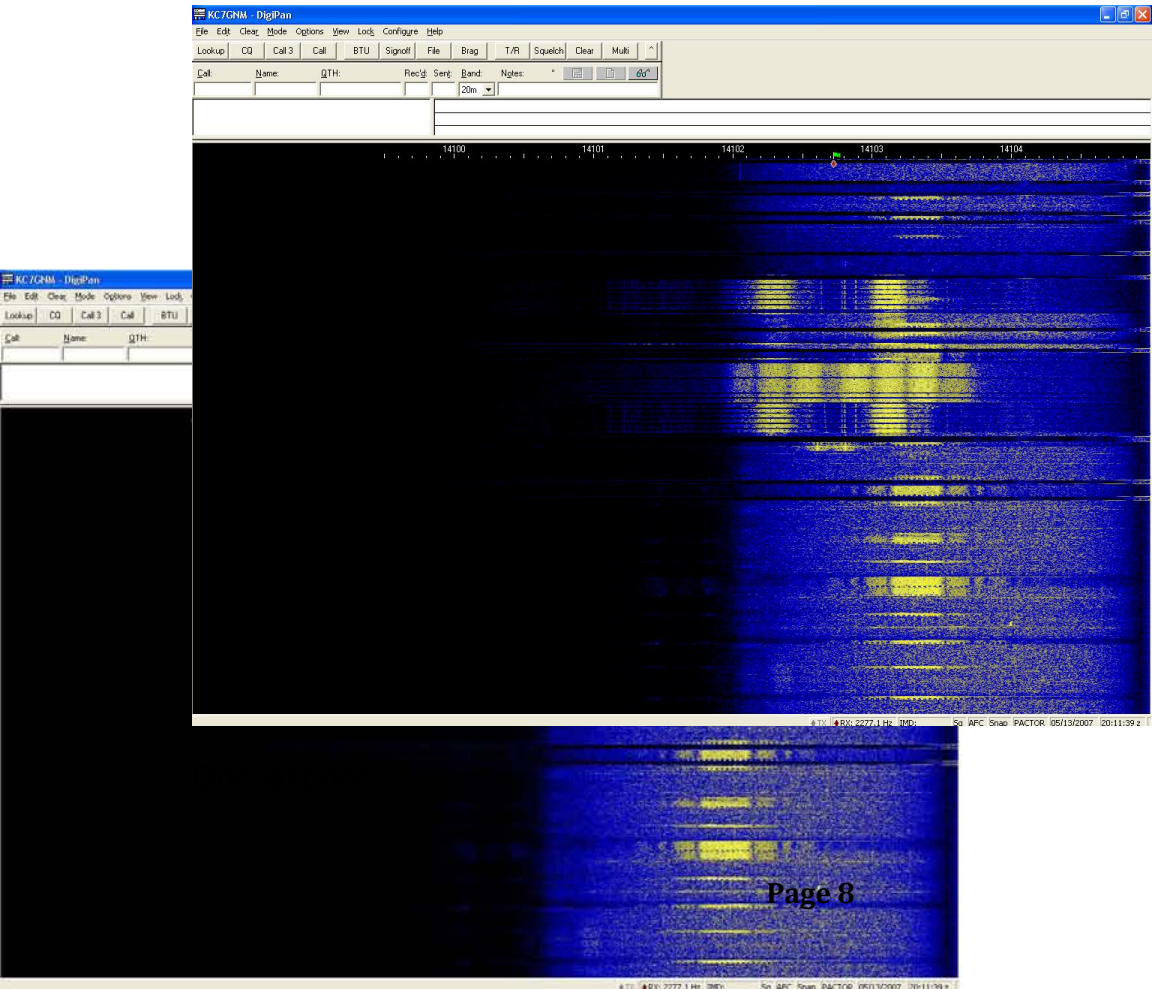
Here is a prime example of the reason s why RM-11392 needs to pass. Notice how the winlink station starts out narrow band Pacor 1 and then switches to Pactor III. When it did it destroyed my QSO.







Here you can plainly see the busy detection obviously works with packet but the Pactor III station does not care who is on the freq first.



The opponents of this RM might say that because of the speed of Pactor III they will be on and off the freq fast therefore leaving it open for longer periods of time. I say that Pactor III is a waste of bandwidth and that because of their actions shown in these screen captures I have collected in Hereford, AZ that they continually and willfully disregard other users of the spectrum.

The Emergency Communications aspect of this is a moot point because our Mobile Command Unit, which was provided by Department of Homeland Security, has the ability to use commercial Satellite for email which in my opinion is much faster and more secure than using the amateur radio spectrum. The problem with winlink is that you must first find a freq that is clear then when you do you may or may not be able to connect to the PMBO because of the scanning nature of winlink. The idea of winlink and pactor III being used for fast access is bogus because of the availability of satellite communications. Also the very unpredictable nature of High Frequency signals it would be insane to rely upon this system for true emergency communications. Winlink 2000 is not the premier EMCOMM tool that many are commenting about.

The true purpose of winlink was and still is to provide boaters with a free email system and thus circumvent a commercially available alternative. This already is in violation of Part 97 rules. I present the relevant section of Part 97:

§97.113 Prohibited transmissions.

(a) No amateur station shall transmit:

(1) Communications specifically prohibited elsewhere in this Part;

(2) Communications for hire or for material compensation, direct or indirect, paid or promised, except as otherwise provided in these rules;

(3) Communications in which the station licensee or control operator has a pecuniary interest, including communications on behalf of an employer. Amateur operators may, however, notify other amateur operators of the availability for sale

or trade of apparatus normally used in an amateur station, provided that such activity is not conducted on a regular basis;

(4) Music using a phone emission except as specifically provided elsewhere in this section; communications intended to facilitate a criminal act; messages encoded for the purpose of obscuring their meaning, except as otherwise provided herein; obscene or indecent words or language; or false or deceptive messages, signals or identification;

(5) Communications, on a regular basis, which could reasonably be furnished alternatively through other radio services.

I have bolded item number 5 because I feel that winlink violates this rule as it is permitting the use of a free email service that can be provided by a service known as Sailmail® which is a commercial service operated on commercial frequencies for the same exact purpose. In fact Sailmail® uses the same exact software and hardware found in Winlink 2000 stations. With the amount of spam on the commercial email systems today and the ability of many spammers to bypass security features of most systems having an email system on the amateur radio bands is a very bad idea.

There are also some amateur radio operators that are claiming this RM will affect the Military Affiliate Radio Service (MARS). This service does not follow the rules for Part 97 of which the Amateur Radio Service (ARS) must operate. The ability to run wide band digital data on MARS frequencies is where Pactor III would work it's best and cause no harmful interference. Mr. Grant Hays commented:

"This petition will greatly reduce the emergency communications support amateur radio operators provide to local, state, regional and federal agencies during disasters and emergencies. PACTOR 3, MT-63 are crucial capabilities in fast and effective communications for emergency management personnel. Using these digital modes, documents, photos, data bases as well as e-mail can be moved with speed and efficiency.

PACTOR 3 and MT-63 are major modes used to interface local/state EOCs and emergency management personnel with the Army MARS system which supports Federal Agencies such as the Transportation Security Administration (TSA)."

This comment has no bearing what so ever on RM-11392 and Mr. Hays comments should be disregarded as having no merit.

I respectfully submit that the FCC should adopt RM-11392 in full to give the amateur radio bands back to the amateurs and not make this a professional service. The idea that going to1.5khz bandwidth will stifle innovation is a hollow argument as already some of the digital audio pioneers are already using less bandwidth for their purposes. Mark Miller has shown in RM-11392 that using a smaller bandwidth does not decrease the throughput by much. I feel that innovation should go with trying to use less space and not more. There really is no innovation by creating wider bandwidths for our limit spectrum. If they are allowed to continue increasing their bandwidth what will we have left when they take up the whole band for one station? The purpose of the amateur radio band is to foster good will all over the world. Permitting modes such as pactor III to proliferate the amateur radio bands is a bad idea.

Respectfully submitted,
Gregory L. Thompson
Amateur Radio Operator, KC7GNM